

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

| | | |
|--|---|------------------------------------|
| BERNHARDT TIEDE, II; | § | |
| TEXAS PRISONS COMMUNITY | § | |
| ADVOCATES; DISABILITY RIGHTS | § | |
| TEXAS; BUILD UP, INC. a/k/a LIONESS: | § | |
| JUSTICE IMPACTED WOMEN'S | § | |
| ALLIANCE; and COALITION FOR TEXANS | § | |
| WITH DISABILITIES, | § | |
| | § | |
| Plaintiffs, | § | Civil Action No.: 1:23-cv-01004-RP |
| v. | § | |
| | § | |
| BRYAN COLLIER, in his official capacity as | § | |
| Executive Director of Texas Department of | § | |
| Criminal Justice, | § | |
| | § | |
| Defendant. | § | |
| | § | |
| | § | |

**PLAINTIFFS' LIST OF EXHIBITS FOR
PRELIMINARY INJUNCTION HEARING**

Tiede v. Collier – Plaintiffs' List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|--|-------|------|---------------|
| 1 | <i>Development of Heat Pyrexia</i> by Joseph Gold (July 16, 1960) | | | |
| 2 | <i>Acute Heat Stroke: Epidemiologic, Biochemical, Renal, and Coagulation Studies</i> by Thomas F. O'Donnell, Jr. (Nov. 24, 1975) | | | |
| 3 | <i>Morbidity and Mortality Associated With the July 1980 Heat Wave in St. Louis and Kansas City, MO</i> by Stephen Jones (June 25, 1982) | | | |
| 4 | <i>Extreme High-Temperature Events: Changes in Their Probabilities with Changes in Mean Temperature</i> by Mearns, Katz and Schneider (Dec. 1, 1984) | | | |
| 5 | <i>Heat-Related Illnesses and Deaths — United States, 1994–1995</i> by MWWR (June 30, 1995) | | | |
| 6 | <i>Heat-Related Deaths During the July 1995 Heat Wave in Chicago</i> by Jan C. Semenza (July 11, 1996) | | | |
| 7 | <i>Heat-Related Death and Mental Illness During the 1999 Cincinnati Heat Wave</i> by Reinhard Kaiser, et al. (Sept. 3, 2001) | | | |
| 8 | <i>Southern Medical Journal: Drug-Associated Heat Stroke</i> (August 1, 2022) | | | |
| 9 | <i>Future Climate: What We Know, What We Don't Know</i> by Linda O. Mearns (Oct. 10, 2002) | | | |

Tiede v. Collier – Plaintiffs' List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|--|-------|------|---------------|
| 10 | <i>Changing Heat-Related Mortality in the United States</i> by Robert E. Davis (Nov. 1, 2003) | | | |
| 11 | <i>Excessive Heat Events Guidebook</i> as published by the U.S. EPA Office of Atmospheric Programs (March 1, 2006) | | | |
| 12 | <i>Dividing the Waters – High Resolution Climate Scenarios</i> by L. O. Mearns (May 14, 2007) | | | |
| 13 | <i>Prognostic Factors in Heat Wave-Related Deaths: A Meta-Analysis</i> by Abderrezak Bouchama (Nov. 12, 2007) | | | |
| 14 | <i>Drug-Induced Hyperhidrosis and Hypohidrosis</i> by William P. Cheshire, Jr., et al. (2008) | | | |
| 15 | <i>The 2006 California Heat Wave: Impacts on Hospitalizations and Emergency Department Visits</i> by Kim Knowlton (Jan. 1, 2009) | | | |
| 16 | <i>Heat-Related Illnesses During the 2003 Heat Wave in an Emergency Service</i> by M. Oberlin, et al. (July 8, 2009) | | | |
| 17 | <i>The Effects of Temperature and Use of Air Conditioning on Hospitalizations</i> by Ban Ostro (Sept. 9, 2010) | | | |
| 18 | <i>The Impact of Extreme Heat on Morbidity in Milwaukee, Wisconsin</i> by Bo Li, et al. (June 8, 2011) | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|---|-------|------|---------------|
| 19 | Temperature Log from the Texas Department of Criminal Justice’s Hutchins Unit (July 15, 2011) | | | |
| 20 | <i>Diagnosis and Treatment of Drug-Induced Hyperthermia</i> by Megan E. Musselman, et al. (Jan. 1, 2013) | | | |
| 21 | Deposition of Roy Storie in <i>McCollum v. Livingston</i> , No. 312-cv-02037, USDC ND TX (March 4, 2014) | | | |
| 22 | <i>Identifying Individual Risk Factors and Documenting the Pattern of Heat-Related Illness through Analyses of Hospitalization and Patterns of Household Cooling</i> by Michael T. Schmeltz (March 5, 2015) | | | |
| 23 | <i>Multiple Trigger Points for Quantifying Heat-Health Impacts: New Evidence from a Hot Climate</i> by Diana B. Petitti (Feb. 1, 2016) | | | |
| 24 | National Weather Service Heat Index Chart (Feb. 26, 2016) | | | |
| 25 | Deposition of Bryan Collier in <i>McCollum v. Livingston</i> , No. 414-cv-3253 in the USDC SD TX (March 30, 2016) | | | |
| 26 | Testimony of Susanna Vassallo in <i>Bailey v. Livingston</i> , No. 414-cv-01698, USDC SD TX (June 1, 2016) | | | |
| 27 | Testimony of Phyllis McWhorter in <i>Cole v. Collier</i> , No. 414-cv-1698, USDC SD TX (June 23, 2017) | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|---|-------|------|---------------|
| 28 | Old Autopsies, Part 1 (filed June 29, 2017) | | | |
| 29 | Old Autopsies, Part 2 (filed June 29, 2017) | | | |
| 30 | Orders and Discovery Responses, <i>Webb v. Livingston, Cole v. Livingston, and Cole v. Collier</i> | | | |
| 31 | Texas Department of Criminal Justice’s Health Services Liaison Facility Types List | | | |
| 32 | <i>“Cooking Them to Death” The Lethal Toll of Hot Prisons</i> by Maurice Chammah (Oct. 11, 2017) | | | |
| 33 | <i>Risk Characterization of Hospitalizations for Mental Illness and/or Behavioral Disorders with Concurrent Heat-Related Illness</i> by Michael T. Schmeltz, et al. (Oct. 16, 2017) | | | |
| 34 | <i>Interim Report 2018</i> by the House Committee on Corrections of the Texas House of Representatives (Nov. 16, 2018) | | | |
| 35 | <i>Influence of Heat Waves on Daily Hospital Visits for Mental Illness in Jinan, China – A Case-Crossover Study</i> by Xuena Liu, et al. (Dec. 30, 2018) | | | |
| 36 | <i>Correctional Managed Health Care Policy Manual, Heat Stress, D-27.2, Effective Date 05/28/2019</i> , as published by the Texas Department of Criminal Justice (May 28, 2019) | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|---|-------|------|---------------|
| 37 | TBCJ 205 th Meeting Minutes (June 21, 2019) | | | |
| 38 | Hearing transcript, <i>Cole v. Collier</i> (Sept. 10, 2019) | | | |
| 39 | <i>Guidelines for Completing the Health Summary for Classification Form Policy A-08.4, Attachment A</i> , as published by the Texas Department of Criminal Justice (Nov. 5, 2019) | | | |
| 40 | TDCJ’s Seasonal Preparedness Memos and Communications, Mr. Collier’s Response to RFP # 4 | | | |
| 41 | TBCJ 208 th Meeting Minutes (Dec. 12, 2019) | | | |
| 42 | <i>Heat-Related Deaths – United States, 2004-2018</i> by Ambarish Vaidyanathan (June 19, 2020) | | | |
| 43 | <i>The Implications of Hypothalamic Abnormalities for Schizophrenia</i> by Hans-Gert Bernstein, et al. (2021) | | | |
| 44 | <i>Use of Multiple Anticholinergic Medications Can Predispose Patients to Severe Non-exertional Hyperthermia</i> by Ahila Manivannan, et al. (March 23, 2021) | | | |
| 45 | <i>After Sweltering Temperatures Killed Texas Prisoners, Lawmakers Vote to Install Air Conditioning</i> by The Texas Tribune (May 14, 2021) | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|---|-------|------|---------------|
| 46 | <i>Global, Regional, and National Burden of Mortality Associated with Non-Optimal Ambient Temperatures from 2000 to 2019: a Three-Stage Modelling Study</i> as published by the Lancet (July 1, 2021) | | | |
| 47 | <i>The Casual Effect of Heat on Violence: Social Implications of Unmitigated Heat Among the Incarcerated</i> by the National Bureau of Economic Research (July 1, 2021) | | | |
| 48 | TDCJ’s Purchase Orders for Temporary Air Conditioning Units | | | |
| 49 | <i>Extreme Weather in Texas</i> by Texas A&M University (Oct. 7, 2021) | | | |
| 50 | <i>Antipsychotic Medication – Induced Hyperthermia Leading to Cerebrovascular Accident: A Case Report</i> by Karimah Best, et al. (Oct. 11, 2021) | | | |
| 51 | Michelle Deitch CV | | | |
| 52 | Correctional Managed Health Care Policy Manual No. H-65.1 (Nov. 22, 2021) | | | |
| 53 | Lioness Members Outside Data - AEO | | | |
| 54 | <i>Association of Extreme Heat With All-Cause Mortality in the Contiguous US, 2008-2017</i> by Sameed Ahmed | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|--|-------|------|---------------|
| 55 | <i>Extreme Temperatures and Covid19 in Texas Prisons</i> by J. Carlee Purdum, Ph.D. et al. (July 2022) | | | |
| 56 | <i>Temperatures Inside Texas Prison Units Regularly Reach 110 Degrees, new report says</i> by Claire Colbert (July 23, 2022) | | | |
| 57 | <i>Temperature Inside Baking Texas Prisons With No AC Regularly Hits 110 Degrees, Study Finds</i> by Josh Marcus (July 26, 2022) | | | |
| 58 | <i>Drug-Induced Hyperthermia Review</i> by Michael Horseman, et al. (July 26, 2022) | | | |
| 59 | <i>New Study Details How Extreme Heat is Affecting Texas Prisons</i> by Texas Standard (July 29, 2022) | | | |
| 60 | <i>Incarceration Rate Report – Highest and Lowest August 1, 2022</i> , published by the Texas Commission on Jail Standards (Aug. 1, 2022) | | | |
| 61 | <i>I Thought I Was Going to Die There. ’ What’s it’s Like to Live with Rising Temperatures in Prison</i> by Hannah Grabenstein (Aug. 19, 2022) | | | |
| 62 | Lioness Members Inside Data - AEO | | | |
| 63 | Communications Between Dr. Dominick and Collier, TIEDE_DEF0110695 (Aug. 23, 2022) | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|---|-------|------|---------------|
| 64 | <i>In a Sweltering Texas Jail, Cool Towels but No Air-Conditioners</i> by NY Times (Aug. 26, 2022) | | | |
| 65 | TDCJ Fiscal Year 2023 Operating Budget (Aug. 26, 2022) | | | |
| 66 | <i>Heatwaves kill more Americans than hurricanes, tornadoes and floods</i> , published by The Economist (Sept. 3, 2022) | | | |
| 67 | <i>Preparing Patients with Serious Mental Illness for Extreme Heat</i> by Carol Lim, et a (Sept. 2022) | | | |
| 68 | TDCJ Joint Budget Hearing (Sept. 30, 2022) | | | |
| 69 | TBCJ 225 th Meeting Minutes (Oct. 14, 2022) | | | |
| 70 | <i>Provision of Air Conditioning and Heat-Related Mortality in Texas Prisons</i> and Supplement by Julianne Skarha et al. (Nov. 2, 2022) | | | |
| 71 | TX Prison Heat Averages 2022-2023 | | | |
| 72 | <i>Statistical Report Fiscal Year 2023</i> as published by the Texas Department of Criminal Justice | | | |
| 73 | <i>2022 Associations Between Extreme Temperatures and Cardiovascular Cause-Specific Mortality: Results From 27 Countries</i> by Barrak Alahmad, et al. (Jan. 3, 2023) | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|--|-------|------|---------------|
| 74 | TBCJ 227 th Meeting Minutes (Feb. 10, 2023) | | | |
| 75 | <i>Heat-Related Mortality in U.S. State and Private Prisons: A Case-Crossover Analysis</i> by Julianne Skarha et al. (March 1, 2023) | | | |
| 76 | <i>Schizophrenia Pinpointed as a Key Factor in Heath Deaths</i> by Warren Cornwall (March 17, 2023) | | | |
| 77 | Charlie Malouff Testimony for HB1355 (March 24, 2023) | | | |
| 78 | Charlie Malouff Testimony for HB2950 (March 24, 2023) | | | |
| 79 | Charlie Malouff Testimony for HB1708 (March 24, 2023) | | | |
| 80 | TBCJ 228 th Meeting Minutes (April 21, 2023) | | | |
| 81 | Picture of Mr. Bernhardt Tiede II (2023) | | | |
| 82 | TBCJ 229 th Meeting Minutes (June 23, 2023) | | | |
| 83 | <i>‘Man Down!’: Surviving the Texas Heat in Prisons Without Air-conditioning</i> by NY Times (June 29, 2023) | | | |
| 84 | Email from John Pulvino (UTMB) to TDCJ and TTUHSC entitled “June 23 Heat Injury Report,” Bates No. TIEDE_DEF0107957 (June 30, 2023) | | | |
| 85 | Attachment to Pulvino Email, Entitled “Heat Related Illnesses Report,” TIEDE_DEF0107958 (June 30, 2023) | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|--|-------|------|---------------|
| 86 | <i>Inmates are Dying in Stifling Texas Prisons, but the State Seldom Acknowledges Heat as a Cause of Death by TEX. TRIBUNE (July 3, 2023)</i> | | | |
| 87 | <i>People in Prison Struggle to Survive Unrelenting Heat Without Air Conditioning by PBS News Weekend (July 15, 2023)</i> | | | |
| 88 | <i>Texas Says No Inmates Have Died Due to Stifling Heat in its Prisons Since 2012. Some Data May Suggest Otherwise, as published by CBS News</i> | | | |
| 89 | Email Complaint re: Hughes Unit Demonstrating How Staffing Issues Hurt Respite Access, TIEDE_DEF0109642 (July 19, 2023) | | | |
| 90 | <i>Texas Prisons Are Cooking People Alive. Are We Okay With That? Part 1 in a series about heat in prison, published by the Austin Chronicle (Aug. 11, 2023)</i> | | | |
| 91 | <i>Extreme Heat and Suicide Watch Incidents Among Incarcerated Men by David H. Cloud, et al. (Aug. 11, 2023)</i> | | | |
| 92 | <i>The State Claims No One Is Dying From 120+°F in Prisons, Part 2 The State’s Response to the Prison Heat Crisis, published by the Austin Chronicle (Aug. 18, 2023)</i> | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|--|-------|------|---------------|
| 93 | 'Why Didn't They Just Kill Us?' Three Women Talk About Life in a Texas Prison Without AC by KUT News (Aug. 18, 2023) | | | |
| 94 | As the death toll in stifling Texas prisons climbs, congressional Democrats ask for investigation by Jodie McCullough (Aug. 21, 2023) | | | |
| 95 | Lobbying to Save Lives in Texas Prisons, It'll Cost \$500 Million to Get A/C in Prisons by Austin Chronicle (Aug. 25, 2023) | | | |
| 96 | Texas Inmates Using Toilet Water to Cool Off in Prisons Without A/C, According to Woman's Viral Testimony by WFAA (Aug. 29, 2023) | | | |
| 97 | Texas Congressman Calls for an Investigation as Prisoner Deaths Spike in Heat by NPR News (Sept. 4, 2023) | | | |
| 98 | Extreme Heat Can be a Death Sentence in Texas Prisons by Yale Climate Connections (Sept. 29, 2023) | | | |
| 99 | Incarcerated People Endure Sweltering Heat and Freezing Cold Inside Ill-Equipped Facilities by the 19 th (Oct. 5, 2023) | | | |
| 100 | Prisoners in 2022 – Statistical Tables as published by the United States Department of Justice, Bureau of Justice Statistics (November 2023) | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|---|-------|------|---------------|
| 101 | TDCJ Complaints and Policies re Temperature in TDCJ Facilities (Nov. 30, 2023) | | | |
| 102 | TDCJ Report “Monitoring of Temperature and Temperature-Related Deaths Fiscal Year 2023 Report” (Dec. 5, 2023) | | | |
| 103 | <i>Mental Illness and Increased Vulnerability to Negative Health Effects from Extreme Heat Events: A Systematic Review</i> by Julia Meadows, et al. (Dec. 15, 2023) | | | |
| 104 | Priya Banerjee, M.D. CV (January 2024) | | | |
| 105 | Linda Mearns CV (February 2024) | | | |
| 106 | Declaration of Antonella Zanobetti (April 10, 2024) | | | |
| 107 | Dean Williams CV | | | |
| 108 | Declaration of Dean Williams (April 11, 2024) | | | |
| 109 | Declaration of Linda Mearns (April 11, 2024) | | | |
| 110 | Declaration of Jennifer Toon (April 12, 2024) | | | |
| 111 | Resume of Charles A. Malouff, Jr., M.P.O.Ret. | | | |
| 112 | Declaration of Priya Banerjee (April 15, 2024) | | | |
| 113 | Declaration of Susi Vassallo (April 15, 2024) | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|---|-------|------|---------------|
| 114 | Susi Vassallo CV | | | |
| 115 | Declaration of Charlie Malouff (April 17, 2024) | | | |
| 116 | Declaration of Chase Bearden (April 17, 2024) | | | |
| 117 | Third Declaration of Jennette Cross, MD (April 18, 2024) | | | |
| 118 | Antonella Zanobetti, PhD. CV (April 22, 2024) | | | |
| 119 | Declaration of Brandon Duke (April 23, 2024) | | | |
| 120 | <i>Exceptional Heat of Summer 2023</i> as maintained by the National Weather Service | | | |
| 121 | <i>Heat Index</i> as maintained by the National Weather Service | | | |
| 122 | <i>TDCJ Air Conditioning Construction Projects</i> as maintained by the Texas Department of Criminal (April 17, 2024) | | | |
| 123 | <i>Texas Profile</i> as maintained by the Prison Policy Initiative | | | |
| 124 | <i>Unit Directory</i> as maintained by the Texas Department of Criminal Justice | | | |
| 125 | <i>What is the heat index</i> as maintained by the National Weather Service | | | |

Tiede v. Collier – Plaintiffs' List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|---|-------|------|---------------|
| 126 | Plaintiff's First Set of Interrogatories to Defendant Bryan Collier in his Official Capacity (June 4, 2024) | | | |
| 127 | Plaintiff's First Set of Requests for Production to Defendant Bryan Collier in his Official Capacity (April 29, 2024) | | | |
| 128 | High Value Data Sets | | | |
| 129 | Subpoena Return for Texas Department of Criminal Justice Hospital | | | |
| 130 | Subpoena Return for University of Texas Medical Branch – Texas Department of Criminal Justice | | | |
| 131 | Jhilam Biswas CV (May 13, 2024) | | | |
| 132 | TDCJ Temperature Report FY2020, TIEDE DEF_17696 | | | |
| 133 | Plaintiffs' Rule 30(b)(6) Notice of Deposition to the Texas Department of Criminal Justice | | | |
| 134 | Tex. Dep't State Health Services License Details for 301 University Blvd. Hospital | | | |
| 135 | TDCJ Hospital Website | | | |
| 136 | Julianne (Julie) Skarha CV | | | |
| 137 | Jason Wilson EMessaging (May 26, 2024 – July 8, 2024) | | | |

Tiede v. Collier – Plaintiffs' List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|---|-------|------|---------------|
| 138 | Jason Wilson Letter and Grievance | | | |
| 139 | Defendant Collier's Responses to Plaintiff Tiede's First Set of Interrogatories (May 31, 2024) | | | |
| 140 | Defendant Collier's Responses to Plaintiff Tiede's First Set of Requests for Production, Bates Nos. TIEDE DEF_00087-13923 (May 31, 2024) | | | |
| 141 | Defendant's Objections and Responses to Plaintiff's First Set of Interrogatories (May 31, 2024) | | | |
| 142 | Defendant's Objections and Responses to Plaintiff's First Set of Requests for Production, Bates Nos. TIEDE DEF_00087-13923 (June 4, 2024) | | | |
| 143 | Second Declaration of Charlie Malouff (June 4, 2024) | | | |
| 144 | Second Declaration of Amite Dominick (June 6, 2024) | | | |
| 145 | Second Declaration of Jennifer Toon (June 6, 2024) | | | |
| 146 | TPCA's Mailing List of Individuals Incarcerated in TDCJ Facilities | | | |
| 147 | Examples of More than 25 Official TPCA Team Member Incarcerated Volunteers | | | |
| 148 | T.X. CURE Inmate Master Mailing List | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|--------------------|--|--------------|-------------|----------------------|
| 149 | Email from K. Blifford to C. Vega re: McConnell Lockdown and Issues with Respite Area Access, TIEDE_DEF0110764 (June 24, 2024) | | | |
| 150 | TDCJ Air Conditioning Construction Projects | | | |
| 151 | Letter from Billy Mitchell to Charlie Malouff (July 1, 2024) | | | |
| 152 | Wilson – Custodial Death Report (July 11, 2024) | | | |
| 153 | Regional Fact Sheet North and Central America | | | |
| 154 | <i>Humane Temperatures Potential Cost Savings Report</i> by TPCA | | | |
| 155 | Odis Banks Death Investigation Materials | | | |
| 156 | Jose Barajas Death Investigation Materials | | | |
| 157 | Mario Benitez Death Investigation Materials | | | |
| 158 | Adam Birchprice Death Investigation Materials | | | |
| 159 | Randy Butler Death Investigation Materials | | | |
| 160 | James Cardona Death Investigation Materials | | | |
| 161 | John Castillo Death Investigation Materials | | | |
| 162 | Christopher Chavez Death Investigation Materials | | | |

Tiede v. Collier – Plaintiffs' List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|---|-------|------|---------------|
| 163 | Clifton Choyce Death Investigation Materials | | | |
| 164 | Diego Duenas Death Investigation Materials | | | |
| 165 | Jordan Dupree Death Investigation Materials | | | |
| 166 | Robert Evitts Death Investigation Materials | | | |
| 167 | Lakeith Ford Death Investigation Materials | | | |
| 168 | Armando Gonzales Death Investigation Materials | | | |
| 169 | Elizabeth Hagerty Death Investigation Materials | | | |
| 170 | Adrian Hayward Death Investigation Materials | | | |
| 171 | Carlos Hernandez Death Investigation Materials | | | |
| 172 | Clifford Hill Death Investigation Materials | | | |
| 173 | John Hurst Death Investigation Materials | | | |
| 174 | Michael Ingram Death Investigation Materials | | | |
| 175 | Antonio Ishmon Death Investigation Materials | | | |
| 176 | Marshall Isome Death Investigation Materials | | | |
| 177 | Anthony Jennings Death Investigation Materials | | | |
| 178 | Brian Loud Death Investigation Materials | | | |
| 179 | Marcus Lumpkins Death Investigation Materials | | | |

Tiede v. Collier – Plaintiffs' List of Exhibits for Preliminary Injunction Hearing

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|-------------|---|-------|------|---------------|
| 180 | Iram Maynez Death Investigation Materials | | | |
| 181 | Michael McCann Death Investigation Materials | | | |
| 182 | Paul Morales Death Investigation Materials | | | |
| 183 | Joel Morris Death Investigation Materials | | | |
| 184 | Jamie Nonn Death Investigation Materials | | | |
| 185 | Andres Ortiz Death Investigation Materials | | | |
| 186 | Stephen Pardue Death Investigation Materials | | | |
| 187 | Michael Peek Death Investigation Materials | | | |
| 188 | Peyton Pendley Death Investigation Materials | | | |
| 189 | Paul Rojas Death Investigation Materials | | | |
| 190 | Eddie Sanchez Death Investigation Materials | | | |
| 191 | John Skinner Death Investigation Materials | | | |
| 192 | Jon Anthony Southards Death Investigation Materials | | | |
| 193 | Cantrell Spears Death Investigation Materials | | | |
| 194 | Arelandis Spiller Death Investigation Materials | | | |
| 195 | Johnny Teeters Death Investigation Materials | | | |
| 196 | Olga Torres Death Investigation Materials | | | |
| 197 | Allen Turner Death Investigation Materials | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

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|-------------|--|-------|------|---------------|
| 198 | Adam Williams Death Investigation Materials | | | |
| 199 | Clint Wilson Death Investigation Materials | | | |
| 200 | Patrick Womack Death Investigation Materials | | | |
| 201 | Marvin Wyatt Death Investigation Materials | | | |
| 202 | Juan Young Death Investigation Materials | | | |
| 203 | Collier’s Response to Interrogatory No. 2, <i>Webb v. Livingston</i> (January 30, 2017) | | | |
| 204 | Mr. Collier’s Response to Interrogatory No. 2, <i>Tiede v. Collier</i> (July 15, 2024) | | | |
| 205 | Mr. Collier’s Response to Interrogatory No. 6, <i>Tiede v. Collier</i> (July 15, 2024) | | | |
| 206 | Inmate and Employees Heat-Related Illnesses Mr. Collier’s Responses to Interrogatory Nos. 8 & 9, <i>Tiede v. Collier</i> (July 15, 2024) | | | |
| 207 | Spreadsheet of TDCJ Employees’ Workers’ Compensation Complaints, Mr. Collier’s Response to Interrogatory No. 10, <i>Tiede v. Collier</i> (July 15, 2024) | | | |
| 208 | Bernhardt Tiede’s Housing Placements, Mr. Collier’s Response to Interrogatory No. 15, <i>Tiede v. Collier</i> (July 15, 2024) | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|--------------------|--|--------------|-------------|----------------------|
| 209 | TDCJ’s Livestock Management Policies, Mr. Collier’s Response to Request for Production No. 17, <i>Tiede v. Collier</i> (July 15, 2024) | | | |
| 210 | Bernhardt Tiede’s Medical Records, Mr. Collier’s Response to Request for Production No. 20, <i>Tiede v. Collier</i> | | | |
| 211 | Inmates’ Lawsuits re: Heat-Related Issues, Mr. Collier’s Response to Request for Production No. 21, <i>Tiede v. Collier</i> | | | |
| 212 | Audio File – J. Wilson Hang up (July 7, 2024) | | | |
| 213 | Audio File – J. Wilson Request for Check (July 7, 2024) | | | |
| 214 | Audio File – Follow up call on WC (July 7, 2024) | | | |
| 215 | Appropriations Committee—S/C on Arts. I, IV, & V (Feb. 14, 2019) | | | |
| 216 | Corrections Committee Collier Testimony (March 21, 2019) | | | |
| 217 | Collier Testimony to Texas State House Committee on Corrections (April 21, 2021) | | | |
| 218 | 87th Legislature Corrections Committee (Sept. 27, 2021) | | | |
| 219 | Appropriations Committee Hearing (July 12, 2022) | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|--------------------|--|--------------|-------------|----------------------|
| 220 | TDCJ Public Information Request (Aug. 31, 2023) | | | |
| 221 | Letter from Elizabeth Guthrie to Lioness (May 28, 2024) | | | |
| 222 | Letter from Samantha Rodman to Lioness (June 10, 2024) | | | |
| 223 | Mr. Collier’s Heat-Related Meetings, Mr. Collier’s Response to Request for Production No. 5, <i>Tiede v. Collier</i> | | | |
| 224 | TDCJ’s Temperature Reports, Mr. Collier’s Responses to Request for Production Nos. 7, 8, 10, <i>Tiede v. Collier</i> | | | |
| 225 | Clifton Buchanan and Dr. Carlee Purdum Testimony at House Appropriations Committee (July 12, 2022) | | | |
| 226 | Collier Testimony at House Appropriations Committee (July 12, 2022) | | | |
| 227 | TDCJ’s Cost Estimates, Mr. Collier’s Response to Request for Production No. 14, <i>Tiede v. Collier</i> | | | |
| 228 | Heat-Related Grievances, Mr. Collier’s Response to Request for Production No. 15, <i>Tiede v. Collier</i> | | | |
| 229 | Heat-Related WC Complaints, Mr. Collier’s Response to Request for Production No. 24, <i>Tiede v. Collier</i> | | | |
| 230 | TDCJ Temperature Logs | | | |
| 231 | Sanctions Order, <i>Cole v. Collier</i> (Dec. 11, 2019) | | | |

Tiede v. Collier – Plaintiffs' List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|-------------|---|-------|------|---------------|
| 232 | Heat Preparedness Posters and Pocket Card | | | |
| 233 | TDCJ Heat Related Illness Video (2017) | | | |
| 234 | TDCJ Heat Related Illness Video (2014) | | | |
| 235 | TDCJ Heat Related Illness Patient Education Video | | | |
| 236 | TDCJ Seasonal Preparedness Memos | | | |
| 237 | Dr. Jeanette Cross CV | | | |
| 238 | Picture of Mr. Bernhardt Tiede II 2016 | | | |
| 239 | Tiede OAG Medical Records (2023) | | | |
| 240 | Tiede Huntsville Memorial Medical Records | | | |
| 241 | Video of Mr. Tiede 1 | | | |
| 242 | Video of Mr. Tiede 2 | | | |
| 243 | Video of Mr. Tiede 3 | | | |
| 244 | Video of Mr. Tiede 4 | | | |
| 245 | Video of Mr. Tiede 5 | | | |
| 246 | Video of Mr. Tiede 6 | | | |
| 247 | Video of Mr. Tiede 7 | | | |
| 248 | Video of Mr. Tiede 8 | | | |
| 249 | Video of Mr. Tiede 9 | | | |
| 250 | Emailed Attachments from A. Carter | | | |
| 251 | Paul S. Uribe, M.D. CV | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|--------------------|--|--------------|-------------|----------------------|
| 252 | Luis Sanchez Death Investigation Materials | | | |
| 253 | Marcus Lumpkins Death Investigation Materials | | | |
| 254 | Mr. Collier’s Responses to Plaintiffs’ First Set of Interrogatories (July 22, 2024) | | | |
| 255 | Rough Transcript of TDCJ Rule 30(b)(6) Witness David Sweetin (July 25, 2024) | | | |
| 256 | Order for Preliminary Injunction, <i>Cole v. Livingston</i> (June 21, 2016) | | | |
| 257 | Memorandum and Order Granting Class Certification, <i>Cole v. Livingston</i> (Jan. 22, 2016) | | | |
| 258 | Memorandum and Opinion regarding Preliminary Injunction, <i>Cole v. Collier</i> (July 19, 2017) | | | |
| 259 | Memorandum and Order regarding Sanctions, <i>Cole v. Collier</i> (Dec. 11, 2019) | | | |
| 260 | TDCJ’s Second Supplemental Responses to Webb’s First Set of Interrogatories, <i>Webb v. Livingston</i> (June 29, 2017) | | | |
| 261 | TDCJ’s Third Supplemental Responses to Webb’s First Set of Interrogatories, <i>Webb v. Livingston</i> (June 29, 2017) | | | |
| 262 | Mr. Collier’s Responses to Plaintiff’s First Set of Requests for Production, <i>Tiede v. Collier</i> (July 22, 2024) | | | |

Tiede v. Collier – Plaintiffs’ List of Exhibits for Preliminary Injunction Hearing

| Exhibit No. | Description of Exhibit | Stip. | Obj. | Date Admitted |
|--------------------|--|--------------|-------------|----------------------|
| 263 | Declaration of Dr. Jeanette Cross with Attachments (Aug. 29, 2023) | | | |
| 264 | Messages between Brittany Robertson and Jason Lee Wilson (May-July 2024) | | | |

DATED this 26th day of July, 2024

Respectfully submitted,

/s/ Kevin D. Homiak

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CERTIFICATE OF SERVICE (CM/ECF)

I HEREBY CERTIFY that the foregoing was electronically filed and served on counsel for all parties of record using the CM/ECF system on July 26, 2024.

/s/ Kevin D. Homiak

Kevin D. Homiak